

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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National Presto Industries, Inc.,

Plaintiff/Counterclaim Defendant,

Case No.: 0:18-cv-03321-SRN-BRT

vs.

U.S. Merchants Financial Group, Inc.,

Defendant/Counterclaimant.

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**U.S. MERCHANTS FINANCIAL  
GROUP'S MOTION TO COMPEL  
DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 37, Defendant and Counterclaimant U.S. Merchants Financial Group, Inc., (“U.S. Merchants”) hereby moves the Court to compel Defendant National Presto Industries, Inc. (“National Presto”) to supplement its response to U.S. Merchants’ Interrogatory No. 22, on or before December 6, 2019, to provide a definitive, exhaustive list of the specific features that make up its claimed trade dress in its HEATDISH parabolic heater and to identify the model numbers for all HEATDISH parabolic heater models that embody its alleged trade dress.

This Motion is based upon the Memorandum of Law (in the form of a letter brief), submitted herewith, and all of the files, records, and proceedings herein.

DATED: November 20, 2019

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Merchants Financial Group, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2019, I caused a true and correct copy of this document to be served on all counsel of record via ECF.

Dated: November 20, 2019

/s/ George B. Ashenmacher

*Attorney for Defendant/Counterclaimant  
U.S. Merchants Financial Group, Inc.*